

Before The
Federal Communications Commission
Washington, D.C.

In the matter of) RM-11828

Amendment of the Rules of the)
Amateur Radio Service to Expand)
Privileges Available to Technician)
Class Operators)

Comments of Larry W. Wheeler in Response to the ARRL's Request for
Rulemaking.
April 2, 2019

To: The Commission

I ask that the Commission deny the ARRL's petition.

The ARRL's petition suggests that the slow growth of the Amateur Radio Service and the lack of personal advancement of its Technician class license holders can be ameliorated by expanding their privileges to include Data and Voice transmissions in the 80, 40 and 15 meter bands.

I infer from their petition that the ARRL believes that prospective amateurs have no understanding of the benefits that the General and Extra class licenses offer. My experience as an instructor and mentor for over forty years has taught me that newcomers are very aware of the benefits. Their insight comes from the ARRL's books that are in almost every library in our nation. They explore the world of amateur radio through the Internet via YouTube and the hundreds of Web sites that are focused on the topic. They understand the concept of incentive licensing and find its challenges a large part of the satisfaction of earning a license. I have as yet to meet a student who is not proud of his or her accomplishment when they pass a test.

There are three primary causes for the issues that the ARRL is addressing: The first is a lack of skilled mentors who understand electronic theory and will take the time to assist newcomers. In a recent speech, the president of the ARRL identified the shortage of mentors as a key issue facing the Amateur Radio Service.

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Comments of Larry W. Wheeler
Re: FCC RM-11828

The second cause of non-advancement of Technician class licensees is the high cost of high frequency amateur radio equipment. Many young adults who may want to become active on the high frequency bands are carrying student loan debt that precludes discretionary spending. Earning a General class license would be of little value to them. Amateurs who are supporting their family or have recently retired also find the cost hard to justify. Low cost second hand equipment is available, however the lack of skilled repairmen in the Amateur Radio Service hinders the newcomer.

The third cause of non-advancement is the imposition of rules concerning the placement of antennas in housing areas. Zoning laws and home owner associations often prohibit the installation of antennas, especially those that are large enough to be useful on the 80, 40 and 15 meter bands.

Nothing in the ARRL's petition addresses the cause of their concerns. Adoption of their petition will allow inexperienced and untrained operators to have access to frequencies and modes that General class licensees have worked to obtain. The frequencies and power levels proposed by the ARRL are those most commonly used by General class license holders. Their opening statement refers to adding limited high frequency data and telephony privileges. The petition is asking that over half of the spectrum in the 80, 40 and 15 meter bands available to General class holders be given to the Technician class licensee.

On February 16th and 17th of this year, The Hoosier Lakes Radio Club hosted a two-day licensing class. Of the 27 students, 21 passed the Technician class exam at the conclusion of the second day. Other clubs offer classes that last only one day. The ARRL would have us believe that these licensees should be allowed to have essentially the same privileges of the General class license holders. I would wager that few of the new license holders know of the danger involved when a high frequency mobile station is operated near a medical facility. Nor do they know the other things that are learned in order to pass the General class test. Any belief that the Technician class license is too difficult for the newcomer is not credible.

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